

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DELOIS EDMONDSON, :

Plaintiff, :

v. : **CIVIL NO. S-02-2803**

JOHN E. POTTER, Postmaster General, :
United States Postal Service,

Defendant. :

**PLAINTIFF'S SUPPLEMENTAL RESPONSES TO DEFENDANT'S
INTERROGATORIES**

TO: JOHN E. POTTER, Postmaster General
United States Postal Service
Defendant

FROM: DELOIS EDMONDSON
Plaintiff

INTERROGATORIES

Interrogatory No. 1:

List all positions which you held prior to commencing employment with the Defendant agency, and, with respect to each such position, state the name and address of the employer; the name and job title of your immediate supervisor; the nature of such employer's business; the dates of such employment; a full description of your responsibilities; your salary during the period of such employment, including fringe and other non-monetary benefits, together with all changes in compensation during the period of your employment; the last date you were employed by an employer other than the

F. Joseph C. Lin, M.D., 8903 Harford Road, Baltimore, Maryland 21234, (410) 584-2752, Gastrologist.

Interrogatory No. 10:

Identify each person, other than expert witnesses, you intend to call as a witness at the trial of this case, the subject matter on which each is expected to testify and the substance of the expected testimony.

Response No. 10:

The following persons have personal knowledge and information of the facts in this case:

A. Gloria Daniels, Light Duty Clerk, Witnessed harassment against Plaintiff and discussed her situation with her.

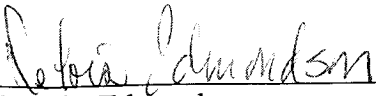
B. Patrice Wright, Light Duty Clerk, Witnessed other employees being treated differently than Plaintiff, particularly with respect to lateness.

C. Kiel Brown, Mail-handler Clerk, Witnessed harassment against Plaintiff, particularly the conduct of Gregory Incontro, Plant Manager.

D. Abe Bakari, President, AFSCME, Represented Plaintiff and can testify as to Plaintiff's intention to amend her administrative complaint to include the charges of race and retaliatory discrimination. Plaintiff completed a second formal complaint. (See annexed).

E. Gloria Drake, Director of Clerk Craft, Union Representative, Witnessed harassment against Plaintiff, represented Plaintiff, and discussed her situation with her.

I have read the above statement and hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.


Delois Edmondson

Subscribed and Sworn to before
me on this ____ day of June, 2003.

Notary Public